

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (Eastern Division)

DIRECTV, Inc., A California Corporation

Plaintiff

V.

Edward Reynolds

Defendant

Case No. 03CV12293 *new*
ANSWER AND
AFFIRMATIVE DEFENSES
OF THE DEFENDANT

ANSWER OF THE DEFENDANT

1. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
2. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
3. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
4. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
5. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
6. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
7. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.

8. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
9. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
10. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
11. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
12. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
13. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
14. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
15. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.

PARTIES

16. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
17. Neither admitted nor denied as the pleader lacks knowledge or information sufficient to form a belief in the truth of the allegation.
18. The Defendant admits he is currently a resident of this District. The Defendant denies the remainder of the allegation and calls upon the Plaintiff to prove same.

19. The Defendant admits he is a resident of Mansfield, MA. The Defendant denies the remainder of the allegation and calls upon the Plaintiff to prove same.
20. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
21. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
22. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
23. The Defendant denies the allegation and calls upon the Plaintiff to prove same.

SUBJECT MATTER JURISDICTION

24. No answer required as the allegation merely states a legal conclusion.
25. No answer required as the allegation merely states a legal conclusion.

VENUE

26. No answer required as the allegation merely states a legal conclusion.

COUNT I

UNAUTHORIZED RECEPTION OF SATELLITE SIGNALS IN VIOLATION OF
47 U.S.C. 605(a)

27. No answer required.
28. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
29. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
30. The Defendant denies the allegation and calls upon the Plaintiff to prove same.

COUNT II

UNAUTHORIZED INTERCEPTION OF ELECTRONIC COMMUNICATIONS
IN VIOLATION OF 18 U.S.C. 2511(1)

31. No answer required.
32. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
33. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
34. The Defendant denies the allegation and calls upon the Plaintiff to prove same.

35. The Defendant denies the allegation and calls upon the Plaintiff to prove same.

COUNT III

36. No answer required.
37. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
38. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
39. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
40. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
41. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
42. The Defendant denies the allegation and calls upon the Plaintiff to prove same.

COUNT IV

ASSEMBLY, MANUFACTURE, AND/OR MODIFICATION OF DEVICES
OR EQUIPMENT IN VIOLATION OF 47 U.S.C. 605

43. No answer required.
44. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
45. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
46. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
47. The Defendant denies the allegation and calls upon the Plaintiff to prove same.
48. The Defendant denies the allegation and calls upon the Plaintiff to prove same.

PRAYER FOR RELIEF

WHEREFORE, the Defendant, Edward Reynolds, requests that this Honorable Court grant him judgment of No Cause of Action together with interest, costs, attorney's fees and any other relief as the Court deems just and equitable.

AFFIRMATIVE DEFENSES

1. The Defendant is not a proper party.

2. Plaintiff has failed to state a claim upon which relief can be granted.
3. Statute of limitations.
4. This cause of action is barred by the facts.

Respectfully Submitted,
EDWARD REYNOLDS,
By His Attorney,

Gregory M. Doyle
4 Pearl Street
Dedham, MA 02026
(781)326-4733
(BBO# 567016)

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon the attorneys of record of all parties to the above action and to all parties appearing in proper by mailing to them at their respective addresses as disclosed by the pleadings of record by United States first class mail, postage prepaid, this _____ day of _____, 2004. I declare that the above statement is true to the best of my information knowledge and belief.

Dated: _____

Gregory M. Doyle
4 Pearl Street
Dedham, MA 02026
(781)326-4733
BBO# 567016